

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)
SALDUTTI LAW GROUP
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1040 Kings Highway North, Suite 100
Cherry Hill, NJ 08034
(856) 779-0300
Counsel for 1st Colonial Community Bank

In Re:

Brian Wolfson,

Debtor.

Case No.: 23-15941-ABA

Chapter: 11

Hrg Date: August 22, 2023 at 10AM

Judge: Hon. Andrew B. Altenburg, Jr.

**NOTICE OF 1st COLONIAL COMMUNITY BANK'S MOTION FOR RELIEF FROM
STAY PURSUANT TO 11 U.S.C. § 362(d)(1) AND (d)(2)**

TO: Clerk, United States Bankruptcy Court
District of New Jersey
Camden, NJ

ALL PARTIES ON THE ATTACHED SERVICE LIST

**1ST COLONIAL COMMUNITY BANK HAS FILED A MOTION FOR RELIEF FROM
THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(d)(1) AND (d)(2) TO ALLOW
IT TO EXERCISE ITS APPLICABLE NON-BANKRUPTCY LAW RIGHTS TO THE
PROPERTY DESCRIBED BELOW.**

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to vacate the automatic stay as to the property identified in the attached schedules to allow the movant to proceed with its non-bankruptcy rights to the property, including but not limited to foreclosure and sale, or if you want the court to consider your views on the motion, then on or before **August 15, 2023**, you or your attorney must do all of the following:

- (a) file written opposition to the motion; and
- (b) attend the hearing scheduled to be held at
Mitchell H. Cohen U.S. Courthouse
400 Cooper Street, 4th Floor
Camden, NJ 08101
Hon. Andrew B. Altenburg, Jr.

Courtroom 4B

On August 22, 2023 at 10:00 a.m.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting the relief.

Pursuant to L.B.R. 9013-1(b), 1st Colonial Community Bank's Motion requests a waiver of the 14-day stay imposed by Fed R. Bankr. P. 4001(a)(3).

Respectfully submitted,
SALDUTTI LAW GROUP
Counsel for 1st Colonial Community Bank

/s/ Rebecca K. McDowell
REBECCA K. MCDOWELL, ESQ.

Dated: July 28, 2023

DESCRIPTION OF SUBJECT PROPERTY

1. 110 Munn Lane, Cherry Hill, New Jersey
2. All personal property as described in Article 4 of the Construction Loan Agreement attached to the Motion
3. \$100,000 bond held in trust as described in the Motion